

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**IN RE:  
KATHY ANN HARRIS**

**Debtor**

) **CASE NO: 19-41787-659**  
) **Chapter 13**  
)  
) **Trustee's Objection to Confirmation**  
) **Original Confirmation Hearing set for :**  
) **May 16, 2019 11:00 am**

**TRUSTEE'S OBJECTION TO CONFIRMATION OF 1ST AMENDED PLAN**

**COMES NOW** Diana S. Daugherty, Standing Chapter 13 Trustee, and for her objection to confirmation states as follows:

1. The set monthly payments to be made by the Trustee exceed the plan payment.
2. The plan does not contain enough funds to pay secured and priority creditors in full and pay the amount guaranteed to general unsecured creditors (if any). 11 U.S.C. §§ 1322(a)(2) and 1325(a)(5)(B)(ii). The approximate amount of the shortfall is \$1550.
3. Paragraph 3.4 modifies plan form in that parenthetical states incorrect minimum repayment period.

**WHEREFORE** the Trustee prays the Court enter its order denying confirmation of the proposed plan.

Dated: June 03, 2019

OBJCONFAP--KLW

/s/ Kathy Wright

Kathy Wright MO31047

Attorney for Trustee

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was filed electronically on June 03, 2019, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on June 03, 2019.

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KATHY ANN HARRIS  
326 MCCULLOUGH AVE  
SAINT LOUIS, MO 63122

/s/ Kathy Wright  
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Kathy Wright MO31047